

B420A (Official Form 420A) (Notice of Motion or Objection) (12/16)

EDVA (12/16)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Kevleena Shenese Webb )

*[Set forth here all names including married, maiden, and  
trade names used by debtor within last 8 years.]* )

Debtor )

Address 6201 Barbourville Lane, Apt 4D )  
North Chesterfield, VA 23234 )

Last four digits of Social Security or Individual Tax-payer )  
Identification (ITIN) No(s)., (if any): 8856 )

Employer's Tax Identification (EIN) No(s). (if any): )  
\_\_\_\_\_ )

Case No. 20-30776

Chapter 13

**NOTICE OF MOTION (OR OBJECTION)**

Afrikka Ennis and LaVaniel Ennis Jr. has filed papers with the court to Motion For Relief from

Stay

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before

3/10/2020, you or your attorney must:

- ☒ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
Eastern District of Virginia, 701 E. Broad St  
Richmond, VA 23219-1888

U.S. BANKRUPTCY COURT  
RICHMOND DIVISION

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You must also send a copy to:

Afrikka and LaVaniel Ennis  
8218 Tatterton Trail,  
N. Chesterfield, VA 23237


☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing**

☒ Attend the hearing on the motion (or objection) scheduled to be held on March 18, 2020 at 11 a.m. at United States Bankruptcy Court, US Bankruptcy Ct, Eastern District of VA, 701 E. Broad St, Court Rm. 5000, Richmond,

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief. 23219-1888

Date: 2/27/2020

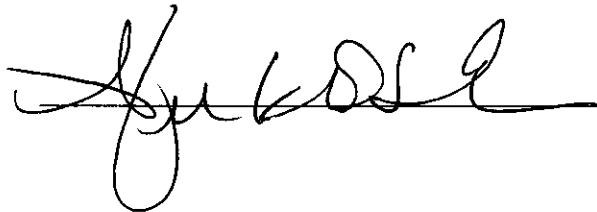
Signature, name, address and telephone number of person giving notice:

  
Afrikka L. Ennis  
8218 Tatterton Trl.  
N. Chesterfield, VA 23237

Virginia State Bar No. N/A  
Counsel for acting pro se

Certificate of Service

I hereby certify that I have this 27 day of February, 20 20, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.



SERVICE LIST

Kevleena S. Webb, Debtor  
6201 Barboursville Lane  
Apt 4D  
North Chesterfield, VA 23234

James E. Kane, Debtor's attorney  
Kane and Papa, PC  
1313 East Cary Street  
PO Box 508  
Richmond, VA 23218-0508

Suzanne E. Wade, Trustee  
7202 Glen Forest Drive  
Suite 202  
Richmond, VA 23226

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA**

) CASE NO. 20-30776-KRH  
)  
) Chapter 13

\_\_\_\_\_  
Afrikka L. Ennis and LaVaniel D. Ennis Jr.,  
Creditor,  
v.  
KEVLEENA S. WEBB,  
Debtor  
\_\_\_\_\_

)  
)  
) MOTION FOR RELIEF FROM STAY  
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U.S. BANKRUPTCY COURT  
RICHMOND DIVISION

COMES NOW a Creditor(s) in this cause, Afrikka Ennis and LaVaniel Ennis Jr., acting pro se, and respectfully moves this Court to enter an Order lifting the automatic stay to allow said creditor to continue receiving repayment of judgment through payroll garnishment. For cause, said party(s) submits the following:

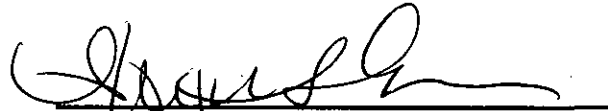
1. Kevleena Shenese Webb filed a Petition under Chapter 13 of the United States Bankruptcy Code on or about February 14, 2020.
2. Movant(s) are the holder of a judgement issued in Chesterfield County General District Court against the Debtor, Kevleena S. Webb, on April 04, 2019 for the principle amount of \$11,545.87. Additional interest and fees in the amount of \$872.75 have accrued since judgment was issued.
3. Movant(s) have issued a garnishment summons through Chesterfield County District Court to secure payment from Creditor's payroll check to pay judgement debt. Per Debtor's employer garnishment processor, Checks dated January 31, 2020 in the amount of \$477.46 and February 14, 2020 in the amount \$294.76, for a total amount of \$772.22 have been reported as sent to Chesterfield County General District Court toward the principle amount granted in the judgment to the Creditors.
4. Debtor was a tenant at 7118 West Road, Chesterfield, VA 23832, which was a property owned by Creditors. Following an eviction filing, debtor vacated property in November 2018. Upon walk through with property manager, extensive damage was visible throughout the home. As such Creditor's filed a Warrant in Debt against the Debtor, to recoup repair costs due to Debtor's actions and/or that of her dependents. Movants presented extensive evidence in court, with Debtor present to provide any mitigation to

claims and after the presiding judge reviewed all evidence presented, he ruled in Creditor's favor and a judgment was granted in the principle amount of \$11,545.87.

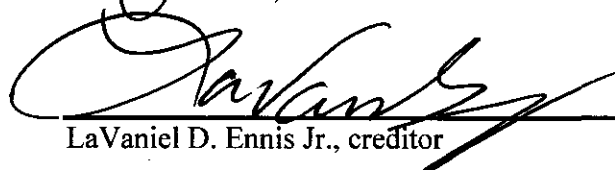
5. Movants request relief from stay as we believe Debtor is not acting in Good Faith.

Debtor previously filed for bankruptcy in 2017 under case number #17-33014-KLP. On May 30, 2019, one month after Movants' judgment was finalized, Debtor voluntarily dismissed that plan. On June 24, 2019 Debtor re-filed a new Chapter 13 plan #19-33315-KLP, to include creditor's judgment. During this time, due to the stay, Creditors were unable to proceed with garnishment to begin to recoup losses. On October 11, 2019 bankruptcy #19-33315-KLP was dismissed per request of the Trustee for failure to commence payments. Once bankruptcy was dismissed, Creditors were able to file a new garnishment summons to collect upon the previous Warrant in Debt judgment. Debtor filed current bankruptcy action on February 14, 2020, approximately two weeks after first payment was garnished from Debtor's paycheck to begin fulfilment of judgement. We believe this is an abuse of the bankruptcy process and is all in effort to avoid payment to Creditors under this judgement and to further draw out the repayment process and was done in previous filing. As such we request the court to provide relief from stay until current bankruptcy has been fully adjudicated, dismissed or otherwise resolved.

Dated this 27 day of February, 2020



Afrikka L. Ennis, creditor



LaVaniel D. Ennis Jr., creditor

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UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

2020 FEB 27 PM 12:08  
U.S. BANKRUPTCY COURT  
RICHMOND DIVISION

In re: Kevleena Shenese Webb

Case No. 20-30776-KRH  
Chapter 13

Debtor(s)

LaVaniel D. Ennis Jr.  
& AFRIKKA L. ENNIS  
Plaintiff(s)

Adversary Proceeding No.

v.

Defendant(s)

CERTIFICATION UNDER LOCAL BANKRUPTCY RULE 2090-1

Document Title: Motion For Relief from Stay  
Date Document Filed: 27 FEB 2020  
Docket Entry No.

I declare under penalty of perjury that (Check one box):

- ☒ No attorney has prepared or assisted in the preparation of this document.  
☐ The following attorney prepared or assisted in the preparation of this document.

\_\_\_\_\_  
(Name of Attorney)

\_\_\_\_\_  
(Address of Attorney)

\_\_\_\_\_  
(Telephone Number of Attorney)

Afrikka Ennis  
Name of Pro Se Party (Print or Type)

LaVaniel D. Ennis Jr.  
Name of Pro Se Party (Print or Type)

[Signature]  
Signature of Pro Se Party

[Signature]  
Signature of Pro Se Party

Executed on: \_\_\_\_\_ (Date)